

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:)
THE FINANCIAL OVERSIGHT AND) PROMESA
MANAGEMENT BOARD FOR PUERTO RICO) TITLE III
as representative of) No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO RICO,)
et al.,) (Jointly Administered)
Debtors.¹)

NOTICE OF WITHDRAWAL OF LEGAL REPRESENTATION

COMES NOW, Brian D. Pfeiffer, Parker J. Milender, Esq., and Taejin Kim, Esq. and respectfully notices the Court as follows:

1. On May 15, 2017, attorneys Brian D. Pfeiffer, Parker J. Milender, and Taejin Kim of the law firm Schulte Roth & Zabel LLP each filed a *Motion to Appear Pro Hac Vice* on behalf of Doral Financial Corporation in the case of this caption [ECF Nos. 94, 95, 96]. On the same day, the Court granted those motions. [ECF No. 149].

2. Attorney Pfeiffer is no longer a member of Schulte Roth & Zabel LLP, but will continue to represent Doral Financial Corporation as a member of White & Case LLP. Accompanying this Notice of Withdrawal is a revised Notice of Appearance of attorney Pfeiffer to reflect his change of law firm. Given that attorney Pfeiffer will continue to represent Doral Financial Corporation, it will not be proceeding *pro se* in the case of this caption.

¹ The Debtors in these Title III Cases, along with each Debtor's respective bankruptcy case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); and (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474).

3. Attorneys Parker J. Milender and Taejin Kim will no longer represent Doral Financial Corporation in the case of this caption, nor will the law firm of Schulte Roth & Zabel LLP.

4. Attorneys Brian D. Pfeiffer, Parker J. Milender, and Taejin Kim each certify that there are no motions pending before the Court on behalf of Doral Financial Corporation, nor are there any trial or hearing dates that have been scheduled.

5. Attorneys Brian D. Pfeiffer, Parker J. Milender, and Taejin Kim now hereby withdraw their respective appearances as counsel for Doral Financial Corporation, to be followed by the revised Notice of Appearance of Brian D. Pfeiffer, attached hereto, to be filed under separate cover, on behalf of Doral Financial Corporation.

WHEREFORE, attorneys Brian D. Pfeiffer, Parker J. Milender and Taejin Kim respectfully request that the Honorable Court take notice of the foregoing.

Date: July 31, 2017

Respectfully submitted,

/s/ Parker J. Milender

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/s/ Taejin Kim

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I HEREBY CERTIFY that on July 31, 2017, I caused to be electronically filed the foregoing *Notice of Withdrawal* with the Clerk of Court, using the CM/ECF system, which will send notification of such filing to all counsel of record, and served the same in accordance with Local Rule 9010-1(d)(3)(B).

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Co-Counsel to Doral Financial Corporation

ATTACHMENT

REVISED NOTICE OF APPEARANCE

Brian D. Pfeiffer
Michele J. Meises
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1221 Avenue of the Americas
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Telephone: (212) 819-8200
Facsimile: (212) 354-8113

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:)
THE FINANCIAL OVERSIGHT AND) PROMESA
MANAGEMENT BOARD FOR PUERTO RICO) TITLE III
as representative of) No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO RICO,)
et al.,) (Jointly Administered)
Debtors.¹)

**REVISED NOTICE OF APPEARANCE
AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the *Notice of Appearance and Request for Service of Papers* [ECF No. 97] that had been filed by Schulte Roth & Zabel LLP (“SRZ LLP”), as co-counsel for Doral Financial Corporation (“DFC”), a party in interest in the above-captioned Title III cases (the “Title III Cases”) (the “SRZ LLP Notice of Appearance”) is being revised because attorney Brian D. Pfeiffer, Esq. (“Attorney Pfeiffer”) is no longer a member of SRZ LLP and is now a member of White & Case LLP.

¹ The Debtors in these Title III Cases, along with each Debtor’s respective bankruptcy case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686).

PLEASE TAKE FURTHER NOTICE that on May 15, 2017, Attorney Pfeiffer filed a *Motion to Appear Pro Hac Vice* on behalf of DFC in the Title III Cases as a member of SRZ LLP [ECF No. 94]. On the same day, the Court granted that motion [ECF No. 149] and SRZ LLP filed the SRZ LLP Notice of Appearance.

PLEASE TAKE FURTHER NOTICE that Attorney Pfeiffer will continue to represent DFC with respect to certain matters as a member of White & Case LLP. As such, DFC hereby enters its revised appearance by its counsel, White & Case LLP, pursuant to Rule 83D(a) of the Local Civil Rules of the United States District Court for the District of Puerto Rico, Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), made applicable to these proceedings by Section 310 of the Puerto Rico Oversight, Management and Economic Stability Act (“PROMESA”), 48 U.S.C. § 2170, and sections 102(1) and 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), made applicable to these proceedings by Section 301 of PROMESA. SRZ LLP has filed a *Notice of Withdrawal of Legal Representation* contemporaneously herewith.

PLEASE TAKE FURTHER NOTICE that DFC hereby requests, pursuant to Bankruptcy Rules 2002 and 9007 and section 1109(b) of the Bankruptcy Code, that the below names be added to the mailing list by the Clerk in the Title III Cases, and that the Clerk and all other parties in interest in the Title III Cases provide, give, and serve all notices given or required to be given and all papers served or required to be served on any party, filed with the Court or delivered to the Office of the United States Trustee in the Title III Cases, to and on:

Brian D. Pfeiffer, Esq. (brian.pfeiffer@whitecase.com)
Michele J. Meises, Esq. (michele.meises@whitecase.com)
WHITE & CASE LLP
1221 Avenue of the Americas
New York, New York 10020-1095
Telephone: (212) 819-8200
Facsimile: (212) 354-8113

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing requests apply to and include not only the notices and papers referenced in the Bankruptcy Rules and Bankruptcy Code, but also include, without limitation, all orders, notices and pleadings relating to any application, motion, petition, objection, pleading, request, hearing, cash-flow report, answering or reply papers, memorandum or brief in support of any of the foregoing, complaint or demand, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, telephone, courier services, hand delivery, facsimile transmission, telecopier, electronic mail, telex or otherwise, electronically or otherwise filed or given with regard to the Title III Cases and the proceedings therein, or that: (1) affects, or seeks to affect, or may potentially affect in any way, any rights or interests of any creditor or party-in-interest in these Title III Cases; (2) affects, or seeks to affect (a) the above-captioned Debtors and/or their estates or (b) property or proceeds thereof in the possession, custody, or control of others that any of the Debtors or their estates may seek to use; or (3) requires or seeks to require any act, delivery of any property, payment or other conduct by DFC, and any other document brought before this Court with respect to these Title III Cases and the proceedings therein, all of which shall be sent to the attorneys listed above.

PLEASE TAKE FURTHER NOTICE that DFC does not, by filing this Revised Notice of Appearance and Request for Service of Papers or any subsequent appearance, pleading, claim, or suit, intend that this Revised Notice of Appearance and Request for Service of Papers constitutes a waiver of any of its rights, nor shall it be deemed to waive any rights of DFC (1) to

trial by jury in any proceeding so triable in the Title III Cases or any case, controversy or proceeding related to the Title III Cases; or (2) to rights, claims, actions, defenses, setoffs, recoupments, or remedies to which DFC is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, recoupments, and remedies are expressly reserved hereby.

WHEREFORE, Attorney Pfeiffer respectfully requests that the Honorable Court take notice of the foregoing.

Dated: New York, New York
July 31, 2017

By: /s/ Brian D. Pfeiffer

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I HEREBY CERTIFY that on July 31, 2017, I caused to be electronically filed the foregoing *Revised Notice of Appearance* with the Clerk of Court, using the CM/ECF system, which will send notification of such filing to all counsel of record, and served the same in accordance with Local Rule 9010-1(d)(3)(B).

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